

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS, INC.,
et al.,**

Counterclaim Plaintiffs,

V.

TONIA HADDIX,

Counterclaim Defendant.

No. 4:16-CV-2163-CDP

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO COMPLY WITH ORDER TO
PAY ATTORNEYS' FEES AND COSTS OF COUNTERCLAIM PLAINTIFFS**

Counterclaim Defendant Tonia Haddix (“Haddix”), by and through undersigned counsel, respectfully requests that this Court grant her a brief extension of time to attempt to comply with this Court’s Order granting Counterclaim Plaintiffs’ motion for attorneys’ fees and costs incurred to obtain compliance with the consent decree. (*See* Doc. 386). Specifically, Haddix respectfully requests an additional 14 days.

On April 4, 2022, Counterclaim Plaintiffs People for the Ethical Treatment of Animals (“PETA”), Inc. and Angela Scott (“Scott”) (collectively, “Counterclaim Plaintiffs”) filed a motion for attorneys’ fees and costs incurred. (Doc. 365). On July 8, 2022, Counterclaim Plaintiffs filed a supplement to their motion for attorneys’ fees and costs incurred. (Doc. 379). On August 5, 2022, Haddix filed her response. (Doc. 384). On August 12, 2022, Counterclaim Plaintiffs filed a reply. (Doc. 385).

On March 27, 2023, this Court granted Counterclaim Plaintiffs' motion, ordering Haddix to pay \$49,062.90 in expenses and \$175,341.34 in attorneys' fees within 7 days. (Doc. 386). Alternatively, this Court Order required the posting of a bond for the full amount of this award and

to pay the full amount of the award within 30 days. (*Id.*).

Undersigned counsel has conferred with counsel for PETA regarding this matter. Counsel for PETA confirmed that it did not oppose a 14-day extension of time to allow Haddix to attempt to obtain a loan to cover this award or, alternatively, to allow for the parties to attempt to negotiate a potential payment agreement. As such, Haddix respectfully requests an additional 14 days to make these attempts. This request is not intended to unnecessarily delay or hinder the proceedings but is, instead, merely made so as to allow Haddix sufficient time to attempt to comply with this Court's Order.

Based on the foregoing, Haddix respectfully requests that this Court grant this motion, permitting her an additional 14 days to attempt to comply with this Court's Order granting Counterclaim Plaintiffs' motion for attorneys' fees and costs incurred to obtain compliance with the consent decree, and for such other and further relief as this Court deems necessary and proper under the circumstances.

Respectfully submitted,

Margulis Gelfand, LLC

/s/ Ian T. Murphy

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Certificate of Service

I hereby certify that the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all parties of record.

/s/ Ian T. Murphy

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